

**From Agricultural Caucus  
Received June 22, 2004**

**Ag Lands Stewardship**

California farmers and ranchers make a daily commitment to the environment. As caretakers of roughly one-third of the state, farmers endeavor to produce high quality farm products in an environmentally responsible manner. The reason? Agriculture is a long-term commitment. The fact that many of California's farming families are fourth and fifth generation speaks to a lasting relationship that farmers have with the land.

Nearly all listed species in California spend at least part of their life cycle on private lands. An estimated 75% of private land in California supports habitat. Eighty percent or more of wildlife in the continental United States is dependent on private land for food, water, and shelter. Finally, it is estimated that 60% of waterfowl in the Pacific Flyway use California rice fields for habitat in the winter months. (Commitment to Conservation, California Farm Bureau Federation, 2d ed., January 2002).

For these reasons, the Advisory Committee's Agricultural Caucus ("Ag Caucus") is quite distressed and displeased with the tone and content of the Agricultural Lands Stewardship ("ALS") section of the California Water Plan Update ("Plan"). The ALS section, as written, has little to do with agricultural land stewardship and much to do with agricultural land conversion.

**The Plan should be a technical guide for water use decisions**

California Water Code, section 10004.5, directs the Department of Water Resources ("DWR") to include in the Plan a discussion of various water strategies intended to "meet the future water needs of the state." Clearly, the Plan is intended to be a technical guide for water use decisions. Nowhere is it indicated that this Plan is to be a land use plan. Throughout this section, however, the author ("staff") continually, and inappropriately, recommends the conversion of agricultural lands to wildlife habitat. Such recommended land use decisions are inappropriate for this document and lie outside the bounds of its statutory authority.

The tone and content of this section does not reflect staff's stated definition and goals for agricultural land stewardship

According to staff's definition of ALS, "[a]gricultural lands stewardship' means farm and ranch landowners – the stewards of the state's agricultural lands – producing public "environmental goods" in conjunction with the food and fiber they have historically provided while keeping land in private ownership." The ALS goal, according to Staff "is to promote sustainable agriculture practices with an economic return, while managing these productive lands for multiple benefits, including water management improvements."

Once the reader progresses past page one, however, it becomes immediately evident from tone and content of the document, that this section is written for those with habitat restoration interests, and that it is not at all written with the interests of agriculture in mind. While the opening paragraphs, containing the quoted language above are alluring, the readers need only read as far as the very next paragraph, found at the top of page two, to discover that staff's true interest is "land fallowing." In all, staff discusses the so-called benefits of land fallowing, described in various terms and by various names, a staggering 37 times<sup>1</sup>

Indeed, in one place, staff even goes so far as to describe a detailed "'land retirement' program" and to list such a program as an example of supposed agricultural stewardship.

**If staff is sincere in its stated goal to "promote sustainable agriculture," these terms have no place in this Plan - and certainly not 37 places in the space of just eight pages. The removal of agricultural land from production to species habitat is not stewardship: It is land conversion.**

The Ag Caucus recommends that staff provide options that include stewardship alternatives to avoid the loss of prime agricultural lands.

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Staff ignores constitutional and legislative provisions that declare the importance of farms and ranches within the existing environment

California's prime agricultural land is a rare environmental resource. In fact, it is a unique environmental resource, among the most ideal lands in the world for sustainable agriculture. This fact has not gone unnoticed by California lawmakers and should be addressed by staff and acknowledged in this section.

California Constitution, Article XIII, Section 8, "heralds the importance of land used for the 'production of food or fiber' along with attendant open space values that significantly contribute to the environment."

In enacting the Delta Protection Act of 1992, the Legislature found:

- (a) The [San Joaquin-Sacramento] Delta is an agricultural region of great value to the state and nation and the retention and continued cultivation and production of fertile peat lands and prime soils are of significant value.
- (b) The agricultural land of the Delta, while adding greatly to the economy of the state, also provides a significant value as open space and habitat for waterfowl using the Pacific Flyway, as well as other wildlife, and the continued dedication of attention to that delta land in agricultural production contributes to the preservation and enhancement of open space and habitat value. (Pub. Res. Code Section 29703).

The Thurman Agricultural Policy Act provides:

A profitable and healthy farming industry must be sustained by a sound natural resource base of soils, water, and air that is developed, conserved, and maintained to assure sufficient quantities and highest optimum quality possible. (Food and Ag. Code Section 802(g)). One of the major principles of the state's agricultural policy shall be "to sustain the long-term productivity of the state's farms by conserving and protecting the soil, water and the air that are agriculture's basic resources." (Food and Ag. Code Section 821(c)).

California Food and Agricultural Code, Section 411 provides:

- "(a) The Department of Food and Agriculture shall supply the Department of Water Resources with a forecast that estimates the amount of production of food, fiber, livestock, and other farm products."
- "(e) The Department of Food and Agriculture shall furnish the forecast to the Department of Water Resources for estimating related water usage . . . The Department of Water Resources shall include this information in Bulletin 160."

The Legislature could not have been any more clear that it expects DWR to consider the effects its strategies will have on farmers and ranchers and their ability to adequately provide for California's growing population.

While staff does list several ALS practices and current ALS initiatives, the subsequent discussions are too brief and peppered with suggestions of land fallowing. These continued references to removing agricultural land from production undercut these fleeting references to ALS, and work to negate any notion of true, agricultural stewardship, as that concept is correctly and attractively (but deceptively) laid out in opening paragraphs of the section.

The Ag Caucus renews its recommendation to staff to delete any strategy that includes the removal of agricultural land from production and develop strategies consistent with the intent of the Legislature to protect and nourish agricultural resources.

**Staff fails to adequately address the adverse impacts associated with agricultural land retirement**

Section 10004.5 instructs DWR to include in the Plan "a discussion of the potential advantages and disadvantages of each strategy . . ." As discussed above, land idling is mentioned time and again, and yet there is scant discussion of the disadvantages and adverse impacts associated with agricultural land retirement.

Staff states, "[a]ny program that *stops irrigation* will have to provide for the cost of establishing permanent vegetation cover that is appropriate to the area, sometimes using temporary irrigation." (Emphasis added.) Staff

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goes on to mention in only two short sentences, start-up costs, program development, administration, and mitigation of impacts. This is an inadequate discussion of the very serious effects of ceasing irrigation on agricultural land.

While the Ag Caucus maintains that all land idling strategies be removed from this section altogether, if staff insists on retaining some discussion of such strategies, at a minimum, staff should fully and adequately address the “disadvantages” that will result. These disadvantages and adverse impacts include, but are not limited to:

- the possibility that with less agricultural land, California farmers and ranchers will be severely challenged to provide adequate, economical food and fiber for a population projected to increase 50% by 2030;
- the breakdown of agricultural infrastructure and fragmentation of agricultural land due to the necessary support services leaving the area;
- the loss of workforce and its associated economic benefits as farm employees relocate;
- the loss of farm-related business, i.e.: shipping, processing, etc., as a result of loss of tonnage;
- physical impacts including changes in drainage patterns, increase in water use, diminished groundwater recharge, and deterioration in water quality; and
- loss of local tax support.

While staff recognizes that mitigation is *required*, staff fails to suggest concrete measures to offset the loss of productive agricultural lands or to substantially lessen or avoid resulting, significant adverse impacts. These measures should be defined in sufficient detail to show proportionality to the magnitude of the impacts.

Finally, staff fails to provide the reader with evidence to indicate how land idling is superior to the proven success from efforts farmers and ranchers are already making in conservation, and thus, to discuss the “advantages” of proposed strategies, as required under section 10004.5. Nor does staff indicate how success will be measured once agricultural land is retired.

The Ag Caucus recommends that staff provide complete information and evidence of success of all recommended strategies in order that the public and decision-makers can compare these recommendations to make informed strategy decisions.

**Staff dismisses the lack of scientific data for its recommendation to retire agricultural land**

Staff states, “despite interest in programs that temporarily or permanently stop irrigation, relatively little comprehensive analysis has been completed on the cost-effectiveness of these programs.” However, staff then goes on to cite a 1991 study, asserting that “[f]indings suggest that stopping irrigation can be a cost-effective solution to meeting a drainage objective . . .” Later, staff again acknowledges that “[t]here is a lack of scientific economic, social and environmental studies and monitoring of agricultural lands stewardship programs to evaluate their merits for ecosystem restoration . . .” These statements beg the question: Why is staff recommending a strategy to retire agricultural land for ecosystem restoration, that admittedly lacks scientific merit?

The Ag Caucus recommends staff either find sound scientific data to back up its recommendations or remove those recommendations from this section.

**Conclusion**

The Agricultural Lands Stewardship section does not provide the technical information necessary to assist local and regional decision-makers, as intended by the Legislature. As drafted, it is instead an environmental thesis, reminiscent of the CalFed’s Working Landscapes program, which, the Ag Caucus would submit, similarly fails to promote true agricultural stewardship, by instead focusing on the conversion of agricultural lands to wildlife habitat.

California’s farmers and ranchers have proven to be excellent, successful stewards of their land and the environment overall. Staff should concentrate on providing accurate information for strategies involving voluntary, incentive-based programs. These programs should encourage the continuation and participation by farmers and ranchers in these programs in harmony with the continued production of California’s vital agricultural lands. Staff should exclude strategies based on the removal of agricultural lands from production.

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<sup>1</sup> Some of the terms and phrases staff uses include, but are not limited to: “land retirement,” “land conversion,” “stopping irrigation on a permanent basis,” “permanently remove land from agriculture,” “public acquisition of land for nonagricultural use,” “cease commercial agriculture,” and “crop-idling.”

Page 2 of Agricultural Land Stewardship, Current Initiatives, states “Since government land acquisition programs can only affect a small portion of agricultural land, -----“. This clause should be eliminated. It implies that government acquisition of farm land is a preferred option!

The last sentence of paragraph 1 on page 3 of the stewardship section states “there are programs which limit or cease commercial agricultural use to promote wetlands and other wildlife sensitive areas----- “. This is reallocation of farm land and water use to environmental use and is not an act of Agricultural Land stewardship. This and proposed land fallowing to benefit the environment should be eliminated from this section.